

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA)	Criminal No.	1:17-CR-177 (MAD)
)		
v.)	Information	
)		
REBECCA HOBBS,)	Violation:	18 U.S.C. § 371
)		[Conspiracy to Commit
)		Marriage Fraud]
)		
)	1 Count	
)		
Defendant.)	County of Offense:	Washington

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1
[Marriage Fraud]

Between 2012 and continuing through at least 2016, in Washington County in the Northern District of New York, and elsewhere, the defendant, **REBECCA HOBBS**, and others conspired to commit marriage fraud by knowingly entering into a marriage for the purpose of evading a provision of the immigration laws, in violation of Title 8, United States Code, Section 1325(c).

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, the conspirators committed the following overt acts, among others, in the Northern District of New York and elsewhere:

- a) In or around 2012, the defendant, a United States citizen, met with Co-Conspirators A and B in Whitehall, New York, and Co-Conspirators A and B offered the defendant money in exchange for entering into a sham marriage with Ketan Choudhary, an alien and citizen of India;

- b) On or about July 16, 2012, the defendant, assisted by Co-Conspirators A and B, and others, entered into a sham marriage with Ketan Choudhary in New Haven, Connecticut;
- c) Subsequently, co-conspirators paid the defendant approximately \$1,000 for entering into the fraudulent marriage with Ketan Choudhary;
- d) On or about February 8, 2013, Ketan Choudhary subscribed, under penalty of perjury, a Form I-485 Application to Register Permanent Residence or Adjust Status (Form I-485) representing that he was legitimately married to the defendant when, as he then well knew, the marriage was a sham;
- e) On or about February 8, 2013, the defendant subscribed, under penalty of perjury, a Petition for Alien Relative (Form I-130) describing Ketan Choudhary as her husband and representing that they lived together in Meriden, Connecticut, when, as she then well knew, the marriage was a sham, and they did not live together;
- f) On or about February 8, 2013, the defendant subscribed, under penalty of perjury, an Affidavit of Support Under Section 213A of the Act (Form I-864) representing, falsely, that she was legitimately married to Ketan Choudhary, and that they resided together in Meriden, Connecticut when, as she then well knew, the marriage was a sham, and they did not live together;
- g) On or about February 8, 2013, the defendant subscribed, under penalty of perjury, a Biographic Information (Form G-325A) representing, falsely, that she was legitimately married to Ketan Choudhary, and that she resided in Meriden, Connecticut when, as she then well knew, the marriage was a sham, and they did not live together; and
- h) Between on or about February 8, 2013, and on or about December 2, 2015, in an effort to deceive Customs and Immigration Services about the legitimacy of their marriage, the

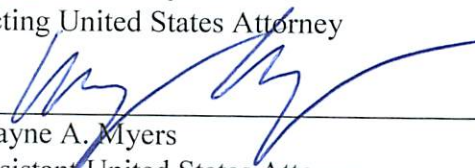
defendant and Ketan Choudhary posed for a variety of pictures and submitted them to Customs and Immigration Services.

In violation of Title 18, United States Code, Section 371.

Dated: 7/24/17

GRANT C. JAQUITH
Acting United States Attorney

By:



Wayne A. Myers
Assistant United States Attorney
Bar Roll No. 517962